

FEDERAL BUILDING (NM0024ZZ) 517 GOLD AVENUE, SOUTHWEST ALBUQUERQUE, NEW MEXICO

ASBESTOS BUILDING AUDIT SURVEY CC: TPMF - AQ

SEPTEMBER 5 - 15, 1995

for

GENERAL SERVICES ADMINISTRATION, REGION 7
FORT WORTH REGIONAL OFFICE
Safety and Environmental Management Branch
FORT WORTH, Texas

NEXT SCHEDULED AUDIT ASSESSMENT SEPTEMBER 15, 1998

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EXECUTIVE SUMMARY

I. EXECUTIVE SUMMARY

An Asbestos Building Audit Survey (ABAS) was conducted in the Federal Building (NM0024ZZ), located at 517 Gold Avenue, SW in Albuquerque, New Mexico. The primary purpose of the survey is to inspect and assess this GSA-operated building for the presence and condition of asbestos-containing materials (ACMs) according to General Services Administrations (GSA), Environmental Protection Agency (EPA) and Occupational Safety and Health Administration (OSHA) Guidance.

Suspect ACMs were identified by specific building locations and grouped according to EPA/AHERA descriptive categories for THERMAL SYSTEM INSULATION, SURFACING ACM MATERIAL, and MISCELLANEOUS ACM MATERIAL types. Within these descriptive categories of ACM MATERIALS, individual Functional Spaces (location activity, design or service function) and Homogeneous Areas (materials uniform in color, texture, or general appearance) are identified and analyzed for asbestos fiber content.

The secondary focus of the Building Audit Survey process develops documented observations and physical assessments of site-specific ACM conditions, relative to the degree of damage identified and the potential for future disturbance or release of suspect ACM fibers. The physical condition of these identified materials represent some level of concern and standardized response action.

The tertiary focus applies standardized EPA/AHERA Decision Tree/Response Action Keys for prioritizing required administrative actions, as well as preventing any additional damage or release of any suspect ACM fibers from these identified materials.

AREAS OF LOW CONCERN (Response Action 7)

These identified Functional Spaces and Homogeneous Areas were positively identified to contain ACM Fibers and/or considered to be Friable, but the physical assessments were all judged NO DAMAGE. Based on the material type and location, there may be potential for damage or release of ACM fibers.

Thermal System Insulation

Mechanical Room Steam line fittings (7-10% Chrysotile) (Possibly throughout) *

Mechanical Room Boiler and chiller cold water supply line fittings (7-10% Chrysotile)

Mechanical Room Drinking water fittings (15-20% Chrysotile)

Mechanical Room Hot water generator insulation (15-20% Chrysotile)

Mechanical Room Boiler Insulation (15-20% Chrysotile)

Mechanical Room Boiler breeching (15-20% Chrysotile)

Mechanical Room Boiler feed line fittings (7-10% Chrysotile)

^{*} No as-built plans were available for review, and potential existence of additional steam line fittings throughout the building was not determinable without destructive techniques. As a result, existence

of these fittings in other locations could not be verified. However, it is possible that they exist throughout the building in conjunction with this system.

Action Plan Recommendations: Continue O & M. Take preventative measures to reduce disturbance. Number indicates priority for removal.

AREAS OF LOW CONCERN (Response Action 8)

These identified Functional Spaces and Homogeneous Areas were positively identified to contain Non-Friable ACM Fibers, but the physical assessments were all judged NO DAMAGE with LOW POTENTIAL FOR DISTURBANCE.

Miscellaneous ACM Materials

Various location, throughout 9" x 9"

9" x 9" floor tile and mastic (3-5% Chrysotile)

Men's restrooms and

Restroom entrances, throughout

Mastic beneath tan, 1' x 1' floor tile (3-5% Chrysotile)

Janitor's Closets, throughout

Mastic beneath White with black scuff marks, 1'x 1' floor tile

(3-5% Chrysotile)

Rooms 1307G and 1307H

Mastic beneath Beige with tan and grey streaks, 1'x 1' floor tile

(3-5% Chrysotile)

Action Plan Recommendations: Continue O & M, until major renovation or demolition requires removal under NESHAPS, or until assessment factors change.

II. INTRODUCTION

The GSA Region 7, Safety and Environmental Management Branch has initiated a standardized Regional Asbestos Management Program. This Asbestos Program utilizes an Asbestos Audit Survey process for standardizing information related to the management of asbestos within GSA-controlled spaces.

Under this program, the Federal Building (NM0024ZZ), located at 517 Gold Avenue, SW in Albuquerque, New Mexico was surveyed for the specific identification/location of all suspect asbestos-containing materials (ACMs) on September 5-15, 1995. This Asbestos Building Audit Survey was scheduled in accordance with the terms of a Task Order Request issued by the General Services Administration (GSA) Region 7, Safety and Environmental Management Branch of the Fort Worth Regional Office.

This Building Audit Survey documentation should assist Asbestos Program Managers (APM) in servicing asbestos related operations/maintenance programs. Such survey report information should administratively support the Asbestos Program Manager responsibilities for; maintaining/updating asbestos program documentation, tracking current/ongoing asbestos operations/maintenance programs; annual surveillance inspection requirements; and any recommended asbestos reinspection/response action requirements.

III. FACILITY DESCRIPTION

The Federal Building (NM0024ZZ), located at 517 Gold Avenue, SW in Albuquerque, New Mexico, is a eight story office building with a basement, and a penthouse fan room. Built in 1956, it has approximately 280,000 square feet of usable space. At the time of this audit, it provided office space for a variety of agencies, as well storage space in the basement.

The building is constructed of concrete and steel structural members with concrete exterior and a built-up roof.

Heating and cooling to the building is provided by a boiler and chillers located in the basement boiler room and delivered to localized air handling units on each floor. Hot water radiant heaters which lie around the building's perimeter are also served by the basement boiler.

Interior finishes of interest include painted sheetrock walls, acoustical tile drop ceilings, and various types of vinyl floor tile.

IV. BUILDING AUDIT SURVEY STRATEGY AND METHODOLOGY

The primary focus of the Building Audit Survey process is to identify suspect materials within a Federal Building which contain or are likely to contain asbestos: This involves:

1. the location, description, and estimation of the quantity for all known or suspected asbestos containing facility materials;

This phase of the Audit Survey process generally applies **EPA/AHERA** criteria for grouping suspect ACMs into four major descriptive categories:

- a. **SURFACING MATERIALS**, which includes materials on walls, ceilings, and structural building members;
- b. **THERMAL SYSTEM INSULATION**, which encompasses tank, boiler, pipe and vessel insulation used for temperature or condensation control;
- c. MISCELLANEOUS MATERIALS, which includes primarily floor and ceiling tiles, integral building members and structural components, or fixtures;
- d. **OTHER MATERIALS**, which includes such items as asbestos gloves or curtains incidental to building occupancy/activities.
- 2. the qualification and identification of all facility functional spaces and homogeneous areas.

Site specific information will attempt to qualify "functional" spaces by location activity, design or service function. The classification of the facility "homogeneous" groups will be based on referenced EPA/AHERA criteria for grouping materials within a specific building which are uniform in color, construction/application date, texture, and general appearance.

V. SUMMARY OF ACM FINDINGS

Although samples were not collected for all building locations, some suspect asbestos-containing material conditions may warrant special treatment, due to historical site information or professional judgment. **EPA/AHERA** protocol (40 CFR Part 763, Subpart E) recommends that when a single sample of a homogeneous area is confirmed to be asbestos-containing, then all manifestations of that material should be considered asbestos-containing.

NOTE: Information provided at the time of the Asbestos Building Audit at the Federal Building (NM0024ZZ), located in Albuquerque, New Mexico did not identify specific information about INACCESSIBLE AREAS and CRAWL SPACES which might have contained suspect Asbestos-Containing Materials. Inaccessible areas should be assumed to contain asbestos-containing materials until independently tested and verified otherwise.

THERMAL SYSTEM INSULATION

This category includes all types and shapes of **INSULATION MATERIALS** (PIPE LAGGING/FITTINGS/BOILER BREECHING) used for temperature or condensation control and identified in the following locations:

Material Type	<u>Location</u>	Quantity	Functional Space Type	<u>Asbestos</u>
Steam line fittings	Room S24	310 fittings *	Mechanical Room	7-10%
Boiler and chiller Cold water supply Line fittings	Room S24	250 fittings	Mechanical Room	7-10%
Drinking water fittings	Room S24	42 fittings	Mechanical Room	15-20%
Hot water Generator insulation	Room S24	54 sq. ft.	Mwechanical Room	15-20%
Boiler Insulation	Room S24	480 sq. ft.	Mechanical Room	15-20%
Boiler breeching	Room S24	1257.5 sq. ft.	Mechanical Room	15-20%
Boiler Feed Line	Room S24	52 fittings	Mechanical Room	7-10%

^{*} No as-built plans were available for review, and potential existence of additional steam line fittings throughout the building was not determinable without destructive techniques. As a result, existence of these fittings in other locations could not be verified. However, it is possible that they exist throughout the building in conjunction with this system.

MISCELLANEOUS ACM MATERIALS

This category includes primarily FLOOR TILE, CEILING TILE AND MASTICS.

Material Type	<u>Location</u>	<u>Quantity</u>	Functional Space Type	<u>Asbestos</u>
9" x 9" floor tile and Mastic	Throughout	132,657 sq. ft.	Office, hallway,	3-5%
Mastic beneath tan, 1' x 1' floor tile	Men's Restrooms and Entrances, Each floor	366 sq. ft.	Restroom, entrance	3-5%

Mastic beneath White Janitor's Closets, 260 sq. ft. Janiotr's closet 3-5% With black scuff marks Each floor

1' x 1' floor tile

Mastic beneath Beige Rooms 1307G, 150 sq. ft. Restroom 3-5% With tan and 1307H

Grey streaks, 1' x 1' floor tile

9" x 9" floor tile was found throughout the building, often under carpet. Several samples of these tiles, which exist in a variety of colors, were found to contain asbestos. As a result, all occurrences of 9" x 9" floor tile, including any which may not be specified in this report, should be considered to contain asbestos.

Samples of black floor tile mastic collected from various locations in the building were found to countian asbestos. It is possible that not every occurrence of this material has been identified. As a result, all occurrences of black floor tile mastic, including any which may not be specified in this report, should be considered to contain asbestos.

SUSPECT MATERIALS NOT SAMPLED

This category includes materials which could not be accessed at the time of the site visit or could not be sampled without using destructive methods.

FIRE DOORS - Fire-rated doors within the facility could not be sampled without using destructive methods. There were no external labels observed identifying fire door contents. Fire doors should be assumed to be asbestos-containing unless independently tested and verified otherwise.

ELEVATOR BRAKES - Brakes shoes and linings on elevators often contain asbestos. These could not be samples without using destructive techniques which could compromise the effectiveness of the brakes. Elevator brake shoes should be assumed to be asbestos-containing unless independently tested and verified otherwise.

NON-ASBESTOS-CONTAINING MATERIALS

This category includes general materials which were sampled because they are commonly suspected to contain asbestos, but, in the Federal Building, were found not to contain asbestos: suspended ceiling tiles, roof tar, certain pipe insulation and cove base and mastic.

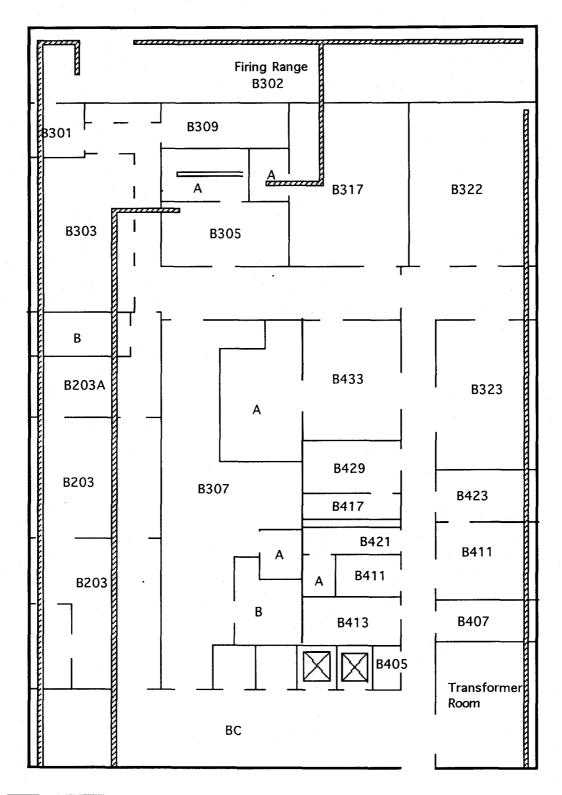
NOTE: See Figure 1 - ACM HOMOGENEOUS AREAS/FLOOR PLAN LOCATIONS

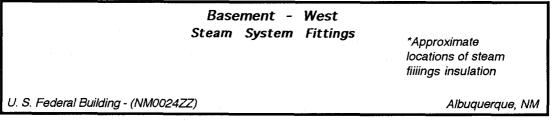
These figures group together all the Building Floor Plan information for each floor referencing specifically the locations of all suspect materials within HOMOGENEOUS AREAS - positively identified as asbestoscontaining (based on confirmation by laboratory analysis). Homogeneous area locations are identified by separate floor plan drawings for; thermal system insulation, surfacing materials and miscellaneous materials.

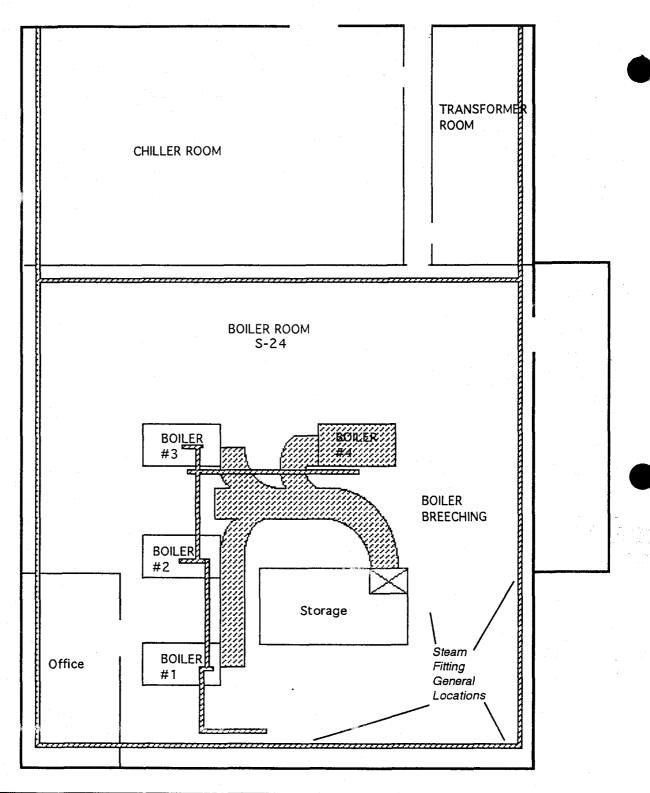
ACM HOMOGENEOUS AREAS/FLOOR PLAN LOCATIONS

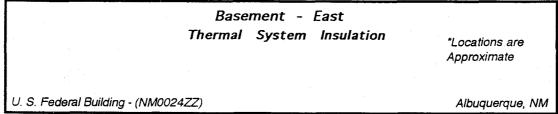
INDEX TO FIGURE 1

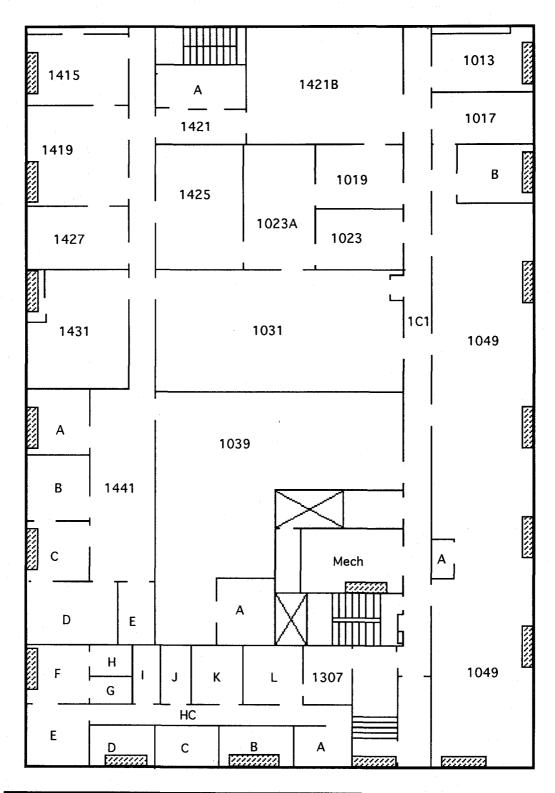
<u>LOCATION</u>	<u>MATERIAL</u>	<u>PAGE</u>
THERMAL SYSTEM INSU	JLATION	
Basement-West Basement-East First Floor-West First Floor-East MISCELLANEOUS MATE	Thermal System Insulation Thermal System Insulation Thermal System Insulation Thermal System Insulation FRIALS	7 8 9 10
Basement-West First Floor-West First Floor-East Second Floor-West Second Floor-East Third Floor-West Third Floor-West Fourth Floor-West	Vinyl Floor Tile	11 12 13 14 15 16 17
Fourth Floor-East Fifth Floor-West Fifth Floor-East Sixth Floor-East Seventh Floor-West Seventh Floor-East Eighth Floor-West	Vinyl Floor Tile Vinyl Floor Tile Vinyl Floor Tile Vinyl Floor Tile Vinyl Floor Tile Vinyl Floor Tile Vinyl Floor Tile	19 20 21 22 23 24 25 26
Eighth Floor-East	Vinyl Floor Tile	27









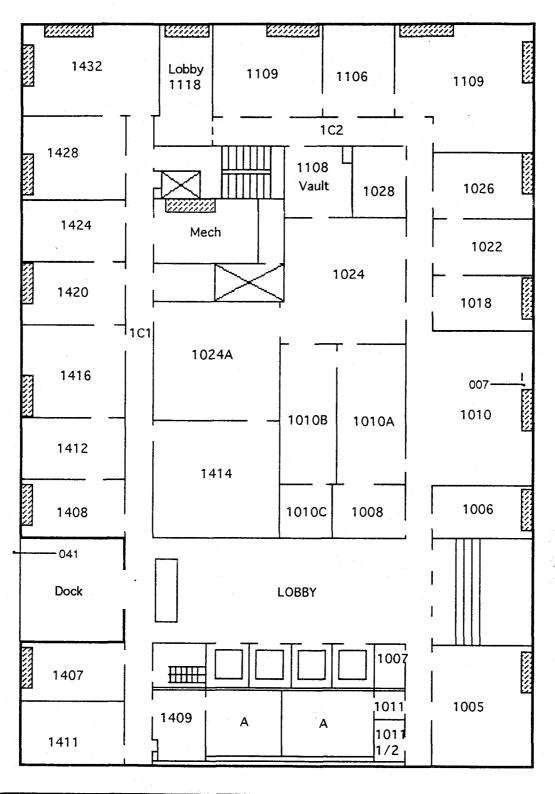


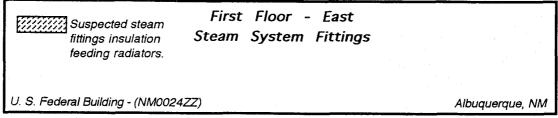
First Floor - West

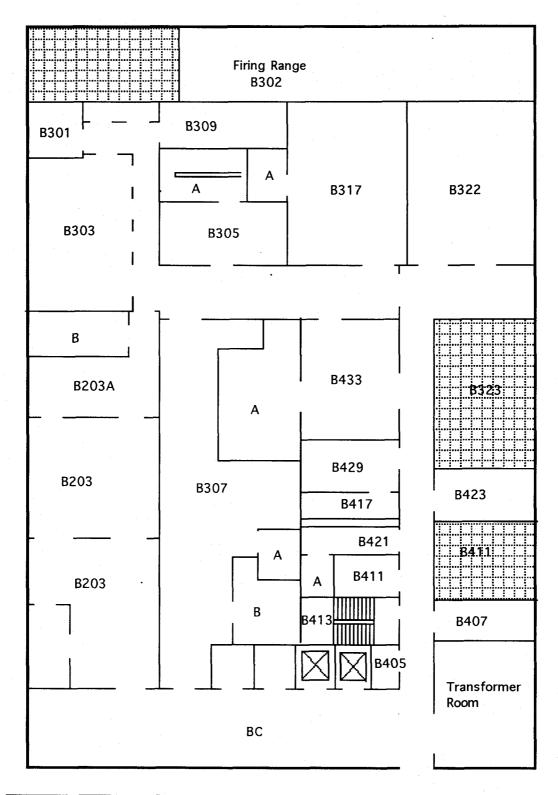
Suspected steam
fitting insulation
feeding radiators.

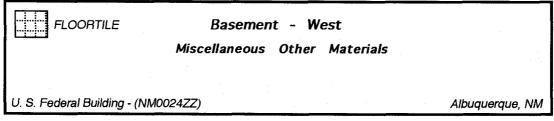
U. S. Federal Building - (NM0024ZZ)

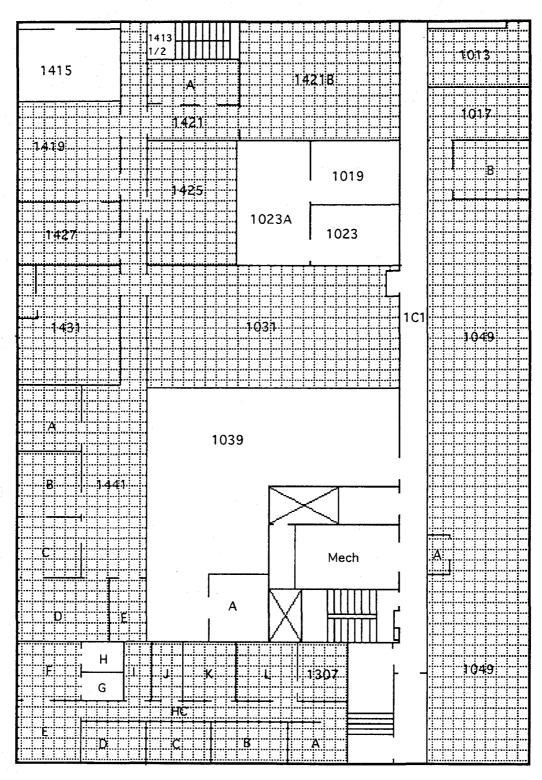
First Floor - West
Seam System Fittings
Albuquerque, NM

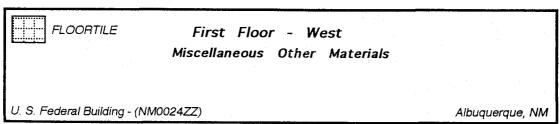


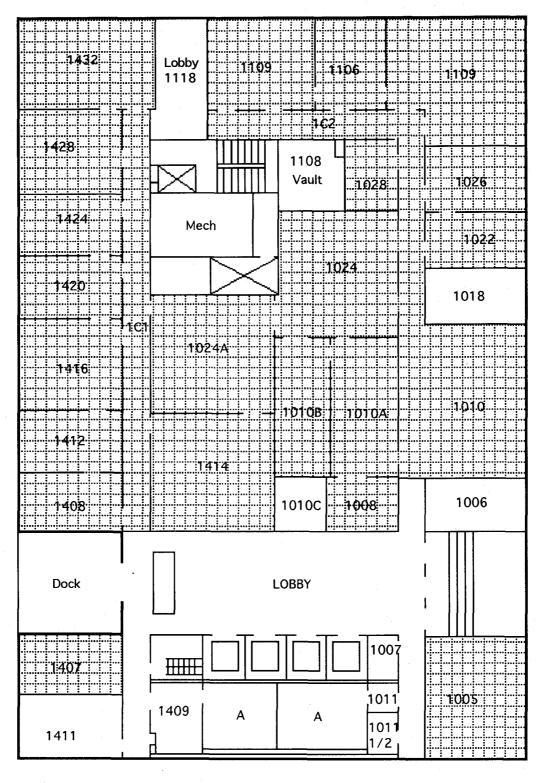


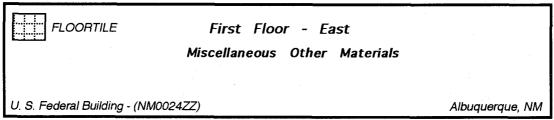


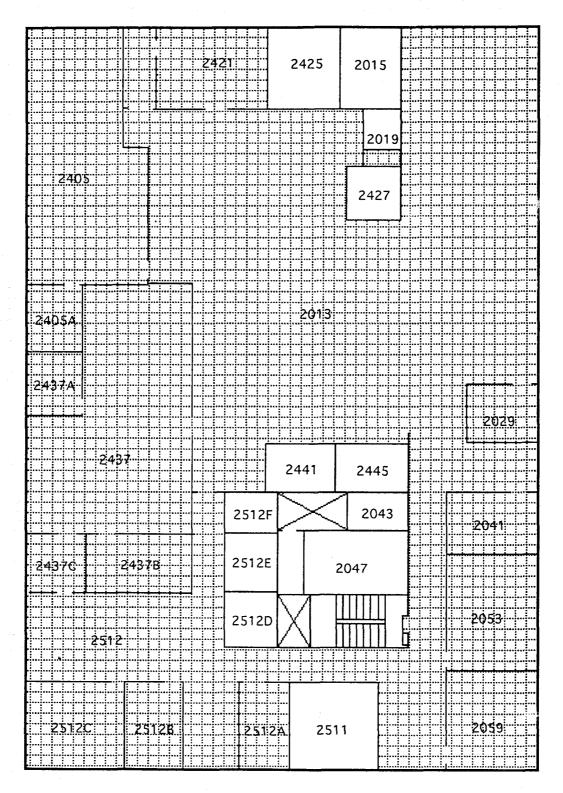


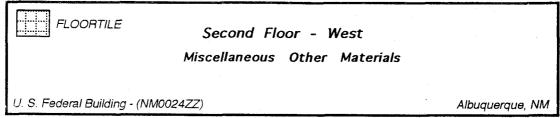


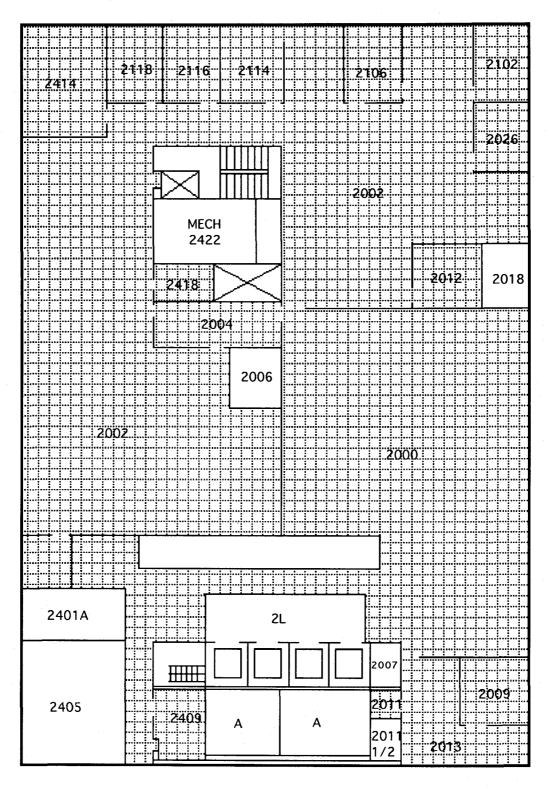




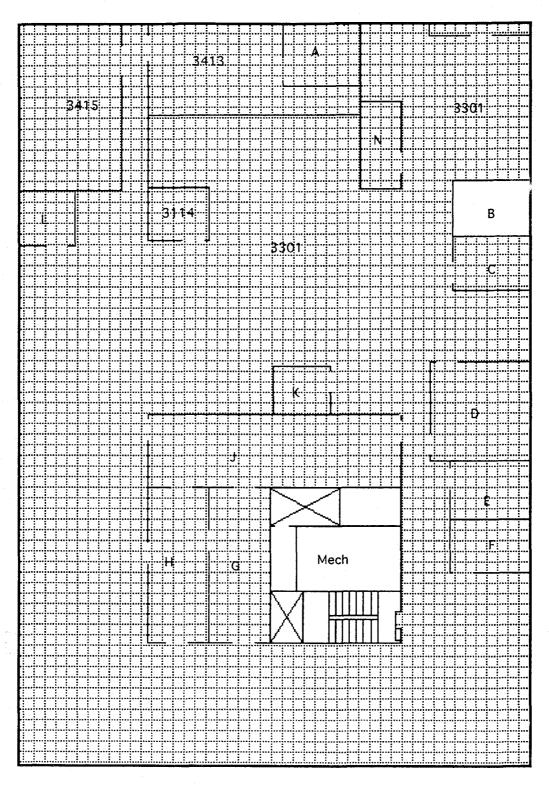


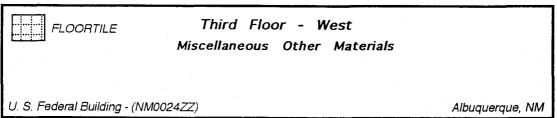


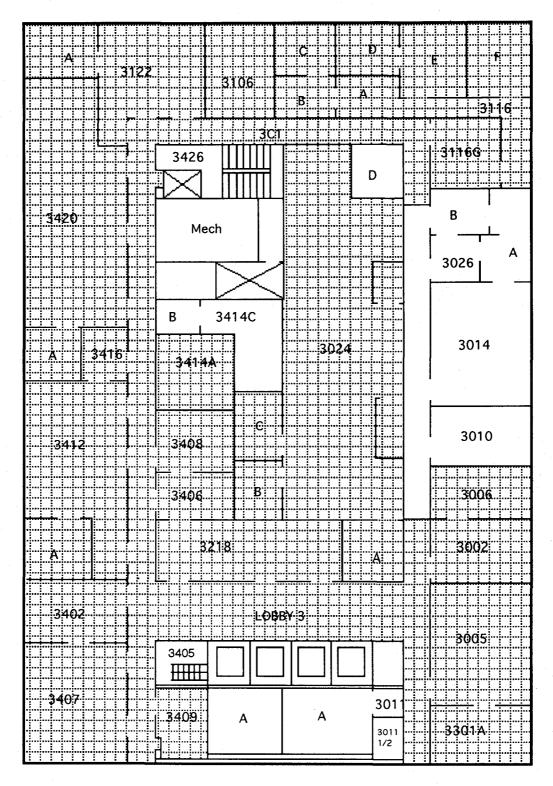




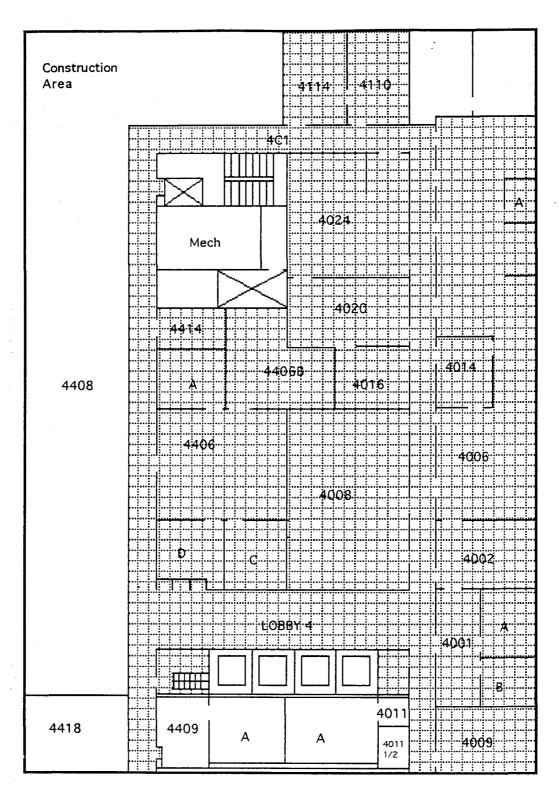
FLOORTILE	Second Floor - East	
	Miscellaneous Other Material	is
U. S. Federal Building - (NN	M002477)	Albuquerque, NM

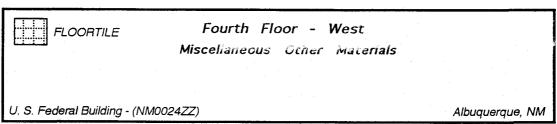


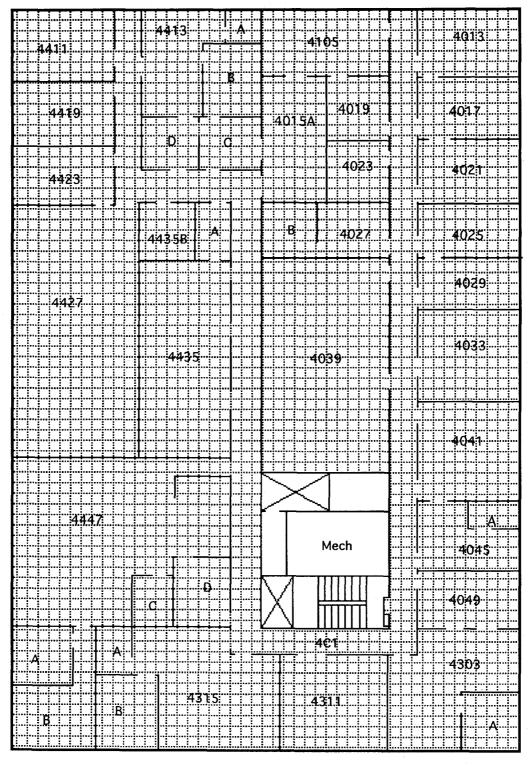


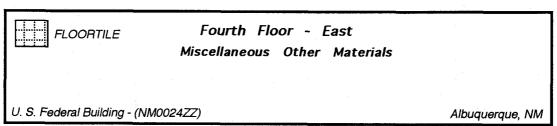


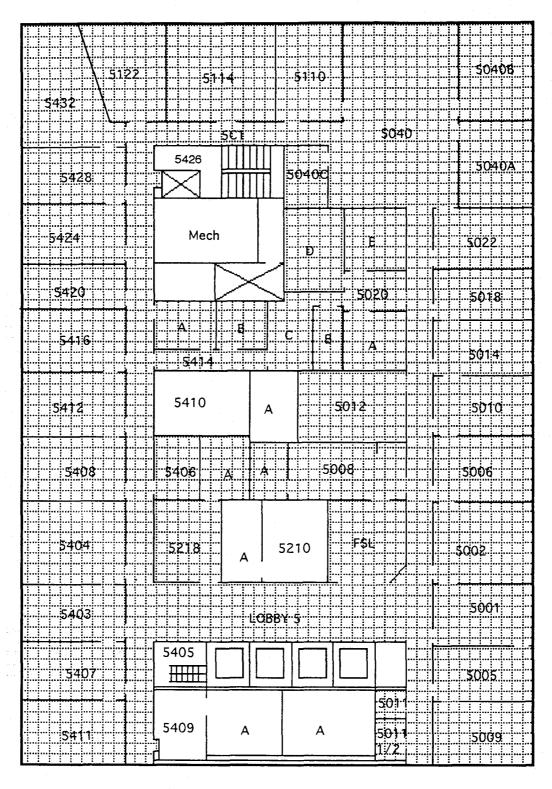
FLOORTILE	Third Floor - East	
	Miscellaneous Other Materials	
U.S. Federal Building - (NM0	0024ZZ)	Albuquerque, NM



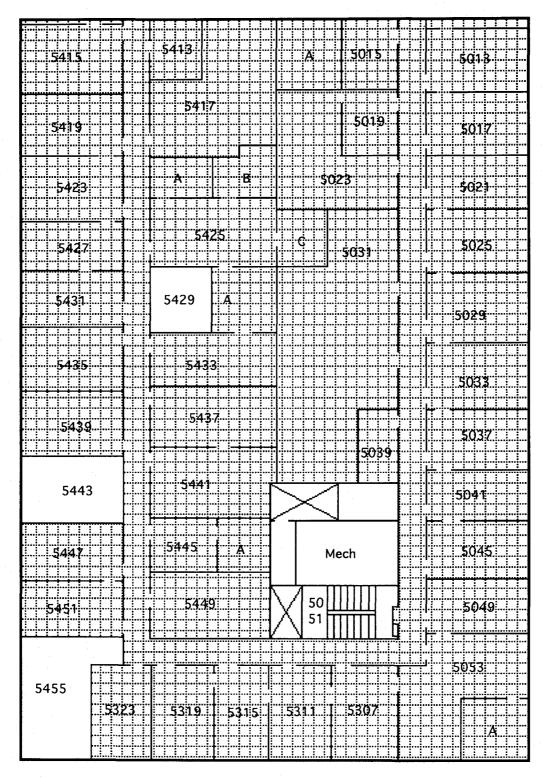


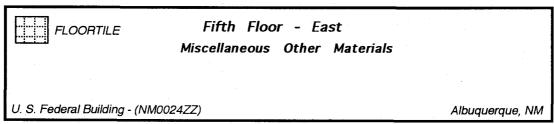


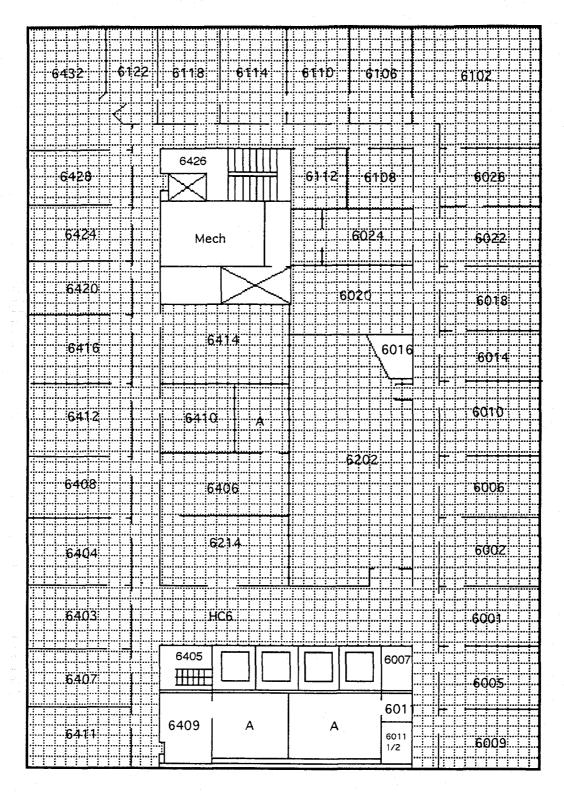




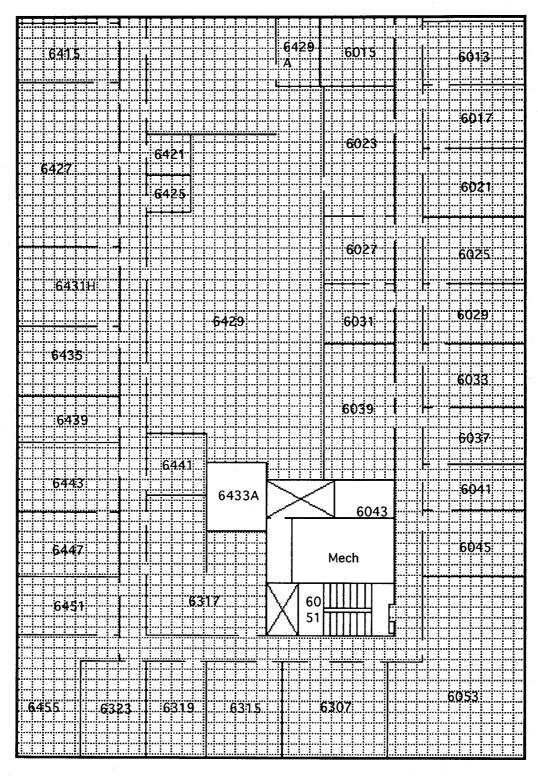
FLOORTILE	Fifth Floor - West	
	Miscellaneous Other Materials	
U. S. Federal Building - (NN	10024 <i>ZZ</i>)	Albuquerque, NM

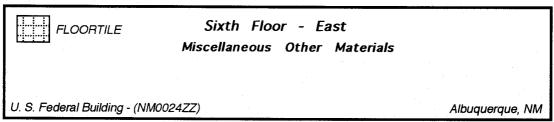


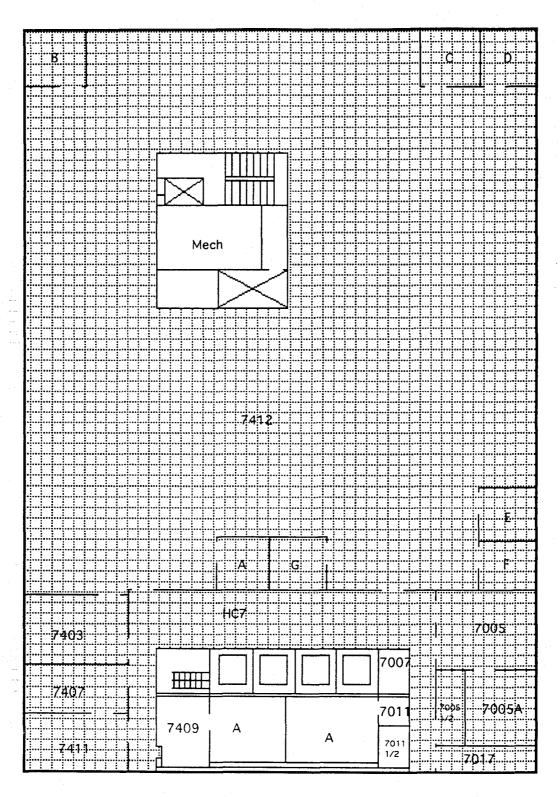




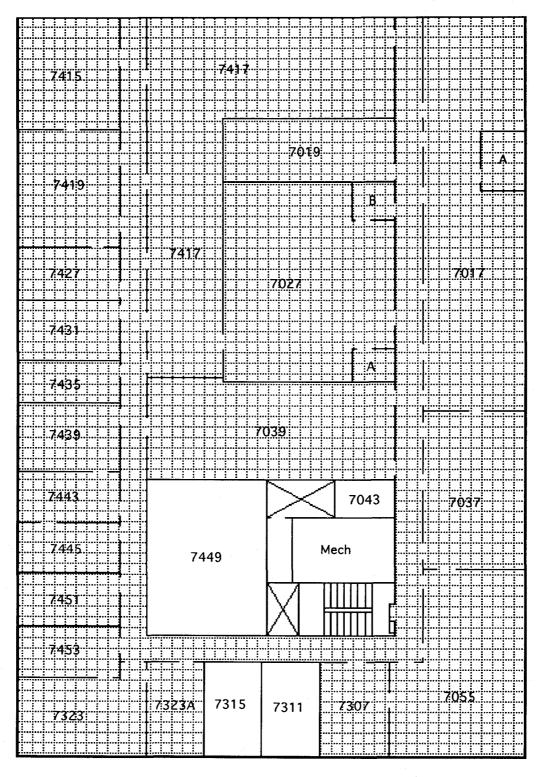
FLOORTILE		
	Miscellaneous Other Materials	
U.S. Federal Building - (NMC	0024ZZ)	Albuquerque, NM

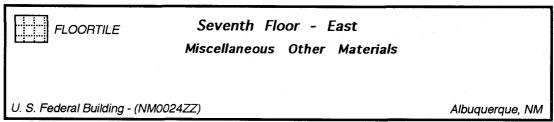


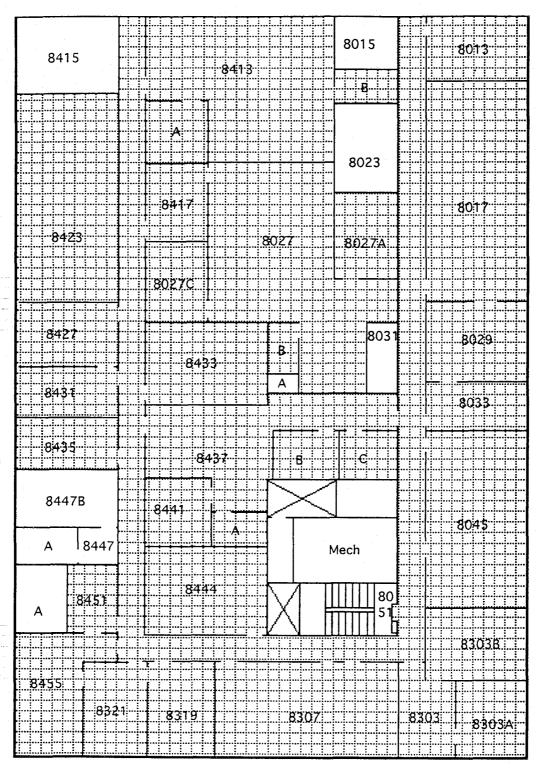


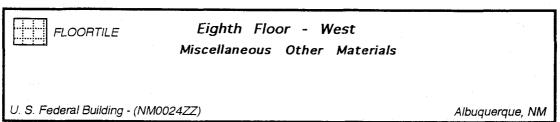


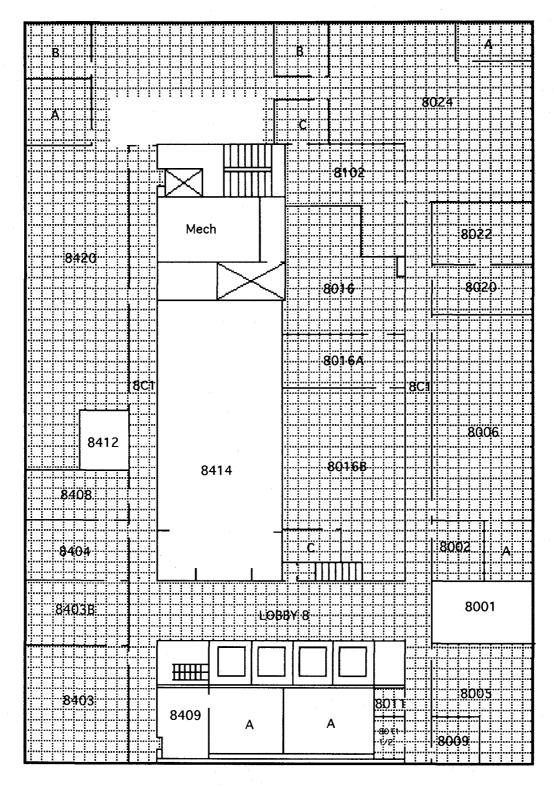
FLOORTILE	Seventh Floor - West Miscellaneous Other Materials	
U. S. Federal Building - (NM0	024 <i>ZZ</i>)	Albuquerque, NM











FLOORTILE	Eighth Floor - East Miscellaneous Other Materials	
U. S. Federal Building - (NMO	024ZZ)	Albuquerque, NM

VI. PHYSICAL ASSESSMENT OF ACM CONDITIONS

As a result of the survey, the presence of asbestos was documented for several types of building materials. The physical assessments for these materials are summarized below.

AREAS OF LOW CONCERN (Response Action 7)

These identified Functional Spaces and Homogeneous Areas were positively identified to contain ACM Fibers and/or considered to be Friable, but the physical assessments were all judged NO DAMAGE. Based on the material type and location, there may be potential for damage or release of ACM fibers.

Thermal System Insulation

Mechanical Room Steam line fittings (7-10% Chrysotile)

Mechanical Room Boiler and chiller cold water supply line fittings (7-10% Chrysotile)

Mechanical Room Drinking water fittings (15-20% Chrysotile)

Mechanical Room Hot water generator insulation (15-20% Chrysotile)

Mechanical Room Boiler Insulation (15-20% Chrysotile)

Mechanical Room Boiler breeching (15-20% Chrysotile)

Mechanical Room Boiler feed line fittings (7-10% Chrysotile)

Steam lines fittings. No as-built plans were available for review, and potential existence of additional steam line fittings throughout the building was not determinable without destructive techniques. As a result, existence of these fittings in other locations could not be verified. However, it is possible that they exist throughout the building in conjunction with this system.

Boiler and chiller cold water supply line fittings. These lines exist in the boiler room (Room S24) on a suspended pipe rack. They are labeled "Hot Water" and "Cold Water", but they are not connected to the domestic water system, nor are they the same diameter as domestic water lines. They appear to supply domestic water to the boiler and chiller to maintain internal water levels.

Drinking water fittings. These fittings are clearly labeled and originate at the drinking water chiller, which is deactivated, in the boiler room.

Hot water generator insulation. This insulation is found on the hot water generator in the boiler room. However, the south end of the generator has been reinsulated with a new material which was observed to be glass fiber insulation covered with flexible plastic. The asbestos-containing insulation is the cloth-wrapped material at the north end.

Boiler insulation. This material is found only on Boiler #4; insulation materials on Boilers # 1, 2 and 3 were found, upon analysis, not to contain asbestos.

Boiler feed line fittings. These lines serve all four boilers and are clearly labeled.

AREAS OF LOW CONCERN (Response Action 8)

These identified Functional Spaces and Homogeneous Areas were positively identified to contain Non-Friable ACM Fibers, but the physical assessments were all judged NO DAMAGE with LOW POTENTIAL FOR DISTURBANCE.

Miscellaneous ACM Materials

Various location, throughout

9" x 9" floor tile and mastic (3-5% Chrysotile)

Men's restrooms and

Mastic beneath tan, 1' x 1' floor tile (3-5% Chrysotile)

Restroom entrances, throughout

Janitor's Closets, throughout

Mastic beneath White with black scuff marks, 1'x 1' floor tile

(3-5% Chrysotile)

Rooms 1307G and 1307H

Mastic beneath Beige with tan and grey streaks, 1'x 1' floor tile

(3-5% Chrysotile)

VII. ACTION PLAN PRIORITIES

Physical Assessment and Response Action Summary

The survey of the Federal Building (NM0024ZZ), located at 517 Gold Avenue, SW in Albuquerque, New Mexico, has identified the presence of asbestos fibers in one type of building materials. The physical condition of this material represents some level of concern and associated response action. It is imperative that an updated ACTION PLAN take into consideration the results of this Building Audit Survey documentation. This will assist in prioritizing required administrative actions, as well as preventing any additional damage or release of any suspect ACM from occurring in these identified materials.

Based on the observations documented and the physical assessment of conditions for future disturbance or degree of damage identified, **EPA/AHERA** criteria have standardized the following specific **Decision Tree/Response Action Key** recommendations for the types of materials identified:

Response	Action Plan
<u>Action #</u>	<u>Priority</u>
7	LOW

Thermal System Insulation

REMOVAL COST ESTIMATES

Material Type	<u>Location</u>	<u>Quantity</u>	<u>Unit Price</u>	<u>Cost</u>
Steam line fittings	Room S24	310 fittings *	\$35.00 ea.	\$10,850.00
Boiler and chiller Cold water supply Line fittings	Room S24	250 fittings	\$ 35.00 еа.	\$ 8,750.00

Drinking water fittings	Room S24	42 fittings	\$ 35.00 еа.	\$ 1,470.00
Hot water Generator insulation	Room S24	54 sq. ft.	\$ 25.00/sq. ft.	\$ 1,350.00
Boiler Insulation	Room S24	480 sq. ft.	\$ 8.00/sq. ft.	\$ 3,840.00
Boiler breeching	Room S24	1257.5 sq. ft.	\$ 12.00/sq. ft.	\$ 315,090.00
Boiler Feed Line	Room S24	52 fittings	\$ 35.00	\$ 1,820.00

^{*} No as-built plans were available for review, and potential existence of additional steam line fittings throughout the building was not determinable without destructive techniques. As a result, existence of these fittings in other locations could not be verified. However, it is possible that they exist throughout the building in conjunction with this system.

Response	Action Plan
<u>Action #</u>	<u>Priority</u>
8	LOW

Miscellaneous ACM Materials

REMOVAL COST ESTIMATES

Material Type	<u>Location</u>	<u>Quantity</u>	Unit Price	<u>Cost</u>
9" x 9" floor tile and Mastic	Throughout	132,657 sq. ft.	\$ 3.00/sq. ft.	\$ 397,971.00
Mastic beneath tan, 1' x 1' floor tile	Men's Restrooms and Entrances, Each floor	366 sq. ft.	Restroom, entrance	\$ 1,098.00
Mastic beneath White With black scuff marks 1' x 1' floor tile	Janitor's Closets, Each floor	260 sq. ft.	Janiotr's closet	\$ 780.00
Mastic beneath Beige With tan and Grey streaks, 1' x 1' floor tile	Rooms 1307G, 1307H	150 sq. ft.	Restroom	\$ 450.00

NOTE:

Estimates do not include costs for material replacement or potential mobilization costs. Actual removal costs may vary greatly due to seasonal and market influences.

General Recommendations

- 1. Additional sampling and physical inspections of all identified/suspect ACM materials prior to any scheduled renovation, demolition, or disturbance of the areas identified are recommended Classify all referenced suspect materials as asbestos-containing until laboratory tests prove otherwise.
- 2. Clean up IMMEDIATELY all loose ACM debris
- 3. Patch and repair IMMEDIATELY any damaged ACM areas.
- 4. All identified damaged suspect asbestos-containing materials that could possibly be disturbed should be removed prior to any renovation/demolition/disturbance.
- 5. Maintain all identified/suspect ACM in good condition until removed or replaced.
- 6. Annually, hereafter, verify contractor/building maintenance personnel with updated EPA/AHERA accredited asbestos training, to provide adequate administrative support in understanding the identified asbestos building conditions and the options available in maintaining and servicing these materials safely.

The provided Building Audit Survey documentation will assist the Facility Asbestos Control Manager with the development of standardized EPA/AHERA Action Response Key References, for site-specific material conditions and their respective potentials for damage.

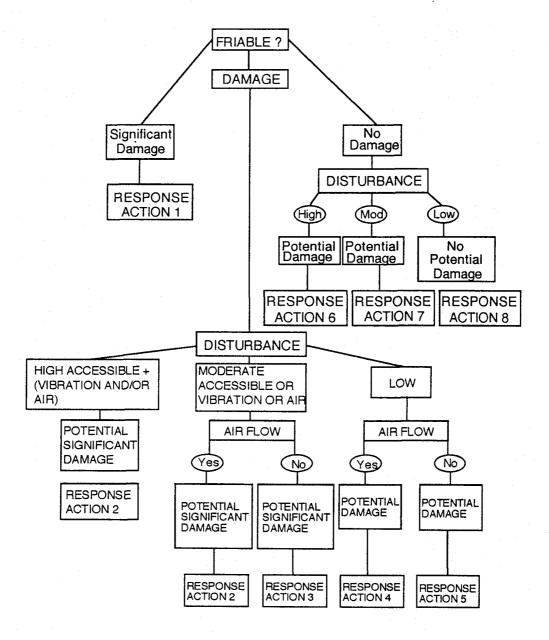
Another administrative consideration for the resulting Audit Survey documentation is background information for the establishment of frequencies for air monitoring surveys and visual inspections, when there are indications that material could become damaged by changes in building use, changes in operations and maintenance practices, or with changes in occupancy.

A review of this report should be performed prior to scheduling any renovation or demolition work within this building to assure that all suspect asbestos-containing material locations have been identified. Subsequent to this inspection, if a previously concealed or undetermined suspect building material is identified, it shall be treated as asbestos-containing, until laboratory analysis proves otherwise.

NOTE: See Figure 2 - EPA/AHERA MODIFIED LOGIC/DECISION TREE for THERMAL SYSTEM INSULATION and Figure 3 - EPA/AHERA MODIFIED LOGIC/DECISION TREE for MISCELLANEOUS MATERIALS.

FIGURE 2

DECISION TREE DIAGRAM FOR THERMAL SYSTEM INSULATION

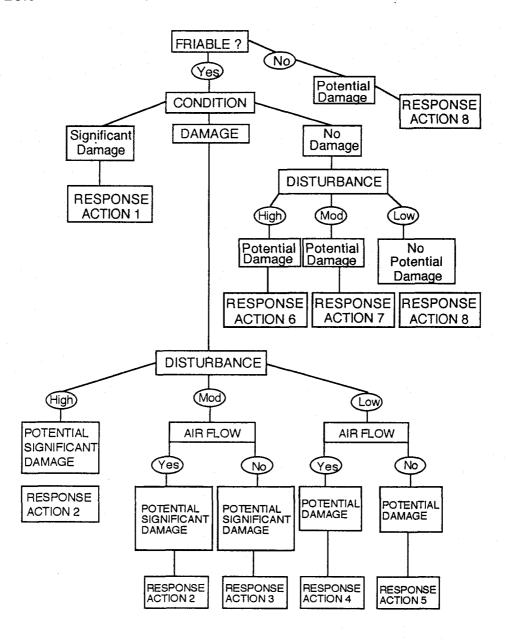


RESPONSE ACTIONS KEY

- 1. Isolate area and restrict access. Remove as soon as possible.
- 2. Continue O&M. Repair orRemove as soon as possible or reduce potential for disturbance.
- 3-5 Repair, continue O&M. Number indicates repairs cannot be done immediately.
- 6-7 Continue O&M. take preventative measuresto reduce disturbance, Number indicates priority for removal.
- 8 Continue O&M until major renovation or demolition requires removal under NESHAPS, or until hazard assessment factors change.

FIGURE 3

DECISION TREE DIAGRAM FOR MISCELLANEOUS ACM MATERIALS



RESPONSE ACTIONS KEY

- 1. Isolate area and restrict access. Remove as soon as possible.
- 2. Continue O&M. Remove as soon as possible or reduce potential for disturbance.
- 3. Continue O&M. Schedule removal when practical or cost effective, or reduce disturbance.
- 4-5 Continue O&M. Schedule removal when practical or cost effective. Number indicates priority for removal.
- 6-7 Continue O&M. take preventative measuresto reduce disturbance, Number indicates priority for removal.
- Continue O&M until major renovation or demolition requires removal under NESHAPS, or until hazard assessment factors change.

Note: An O&M program may include enclosure and encapsulation, where appropriate to increase effectiveness of O&M.

APPENDICES

- A. REGULATORY REQUIREMENTS AND GUIDELINES
- B. SUSPECT MATERIAL ASSESSMENT CRITERIA
- C. ERRORS AND OMISSIONS
- D. SAMPLING AND LABORATORY ANALYSIS PROTOCOLS

BULK SAMPLE CHAIN OF CUSTODY FORMS BULK SAMPLE LABORATORY RESULTS BULK SAMPLE ACM INDEX BUILDING PLAN/BULK SAMPLE LOCATIONS LABORATORY ACCREDITATION

E. PHOTOGRAPHS

PHOTOGRAPH INDEX PHOTOGRAPHS

F. ASBESTOS ASSESSMENT FORMS

BUILDING MATERIAL ABBREVIATION CODE/INDEX ASBESTOS SURVEY INPUT SHEETS (BEATS) ASBESTOS CONTAINING MATERIAL ASSESSMENT FORMS BUILDING INSPECTION SUMMARY SHEETS

G. BUILDING FLOOR PLANS

FLOOR PLAN/ROOM LOCATIONS ACM HOMOGENEOUS AREAS/FLOOR PLAN LOCATIONS INACCESSIBLE AREAS

H. ASBESTOS AUDIT CHECKLIST

ASBESTOS AUDIT: NM0024ZZ

APPENDIX A:

REGULATORY REQUIREMENTS AND GUIDELINES

This APPENDIX provides a discussion of Federal NESHAP Program Requirements, as well as the identification of specific Federal regulations/policies (OSHA/EPA/DOT/GSA) that relate to asbestos-associated activities.

A. REGULATORY REQUIREMENTS AND GUIDELINES

Since asbestos presents a significant risk to human health as a result of air emissions from one or more source categories, it is therefore considered a hazardous air pollutant by the Environmental Protection Agency (EPA). EPA promulgated the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 61, Subpart M) which addresses milling, manufacturing and fabricating operations, demolition and renovation activities, waste disposal issues, active and inactive waste disposal sites and asbestos conversion processes.

In the initial Asbestos NESHAP rule promulgated in 1973, a distinction was made between building materials that would readily release asbestos fibers when damaged or disturbed, and those that were unlikely to result in significant fiber release (FRIABLE/NON-FRIABLE).

Failure to become aware of regulatory requirements may result in negligent acts. Federal, state, and local laws and regulations apply to the performance of asbestos related work activities. Therefore it is extremely important that all legal requirement are adhered to. State and local regulations may be more stringent than federal standards and may change quickly.

Specific Federal regulations that affect asbestos work include:

EPA/NESHAPS. This establishes notification and work practice standards for asbestos removal during building renovation and demolition.

OSHA ASBESTOS STANDARDS (29 CFR 1910.1001 and 1926.1101). These provide for worker protection standards with established exposure limits, work practice criteria, medical surveillance and training program requirements to control asbestos exposure within the workplace.

EPA/ASBESTOS BAN AND PHASE-OUT RULE. This rule prohibits the manufacture, importation, processing, or distribution in commerce of asbestos in certain products and phases out the use of other products containing asbestos.

DOT. These rules establish requirements for the transport of asbestos.

At present, it is GSA policy to ensure that all Federal facilities are inspected for the presence of asbestos-containing materials, in accordance with EPA guidance. All questions and concerns should be directed to the Regional Office at the following address:

GENERAL SERVICES ADMINISTRATION, REGION 7
FORT WORTH REGIONAL OFFICE

Safety and Environmental Management Branch 819 Taylor Street (7PMS) Fort Worth, Texas 76102